

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

HABIBOOLA NIAMATALI (1)

§
§
§
§
§

No. 4:13CR176

Judge Crone

EXHIBIT LIST

July 2016

EXHIBIT NO.	SPONSOR	DESCRIPTION	O F F	O B J	E N T
1a	Tanisha Washington	Recording of November 9, 2010, undercover meeting at Lancaster Clinic	25		✓
1b	Tanisha Washington	Transcript of Exhibit 1a	25		✓
1c	Tanisha Washington	Photographs from Exhibit 1a	25		✓
2	Tanisha Washington	Pharmacy receipts for controlled substances prescription	25		✓
3	Tanisha Washington	Controlled substances	25		✓
4a	Tanisha Washington	Recording of November 17, 2010, undercover meeting at Garland Clinic	25		✓
4b	Tanisha Washington	Transcript of Exhibit 4a	25		✓
4c	Tanisha Washington	Photograph from Exhibit 4a	25		✓
5		Reserved			
6	Tanisha Washington	Prescriptions for controlled substances	25		✓
7	Nick Bristow	Prescriptions for controlled substances	25		✓
8a	Tanisha Washington	Recording of December 17, 2010, undercover meeting at Lancaster Clinic	26		✓
8b	Tanisha Washington	Transcript of Exhibit 8a	26		✓
9	Tanisha Washington	Pharmacy receipts for controlled substances prescription	25		✓

Exhibit List – Niamatali

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EXHIBIT NO.	SPONSOR	DESCRIPTION	O F F	O B J	E N T
10	Nick Bristow	Pharmacy receipts for controlled substances prescription	25		✓
11	Tanisha Washington	Controlled substances	26		✓
12a	Tanisha Washington	Recording of January 18, 2011, undercover meeting at Lancaster Clinic	26		✓
12b	Tanisha Washington	Transcript of Exhibit 12a	25		✓
12c	Tanisha Washington	Photographs from Exhibit 12a	25		✓
13	Tanisha Washington	Prescription for controlled substances	25		✓
14a	Tanisha Washington	Recording of February 17, 2011, undercover meeting at Lancaster Clinic	26		✓
14b	Tanisha Washington	Transcript of Exhibit 14a	26		✓
14c	Tanisha Washington	Photographs from Exhibit 14a	25		✓
15	Tanisha Washington	Prescription for controlled substances	25		✓
16	Tanisha Washington	Controlled substances	25		✓
17		Reserved			
18		Reserved			
19	Nick Bristow	Recording of February 23, 2011, surveillance outside Garland Clinic	25		✓
20	Chris Woolbright	Recording of May 10, 2011, surveillance outside Lancaster Clinic	25		✓
21	Chris Woolbright	Recording of May 11, 2011, surveillance outside Garland Clinic	25		✓
22	Chris Huerta	Recording of May 31, 2011, interaction with Habiboola Niamatali after traffic stop	25		✓
23a	Susannah Herkert	Recording of June 15, 2011, interview of Habiboola Niamatali	25		✓
23b	Susannah Herkert	Transcript of Exhibit 23a	25		✓

EXHIBIT NO.	SPONSOR	DESCRIPTION	O F F	O B J	E N T
24	Tanisha Washington or Chris Woolbright	Signs inside Lancaster Clinic	25		✓
25	Tanisha Washington or Chris Woolbright	Signs inside Lancaster Clinic	25		✓
26	Tanisha Washington or Chris Woolbright	Signs inside Lancaster Clinic	25		✓
27	Tanisha Washington or Chris Woolbright	Signs inside Lancaster Clinic	25		✓
28	Tanisha Washington or Chris Woolbright	Signs inside Lancaster Clinic	25		✓
29		Reserved			
30	Chris Woolbright	Documents found in Lancaster Clinic on June 15, 2011	26	✓	✓
31	Chris Woolbright	Note found in Lancaster Clinic on June 15, 2011	26	✓	✓
32	Susannah Herkert or Chris Woolbright	Patient files found in Lancaster Clinic on June 15, 2011			
33	Susannah Herkert or Chris Neel	Patient files found in Garland Clinic on June 15, 2011			
34	Tanisha Washington or Chris Neel	Signs inside Garland Clinic	25		✓
35		Reserved			

EXHIBIT NO.	SPONSOR	DESCRIPTION	O F F	O B J	E N T
36		Reserved			
37	Susannah Herkert	Photographs of cash and other items found inside Hickory Creek residence on June 15, 2011	25		✓
38	Susannah Herkert	Texas DPS Prescription Monitoring Program (PMP) records for Habiboola Niamatali	27	✓	✓
39	Susannah Herkert	Summary Chart of PMP records – controlled substances prescribed by Habiboola Niamatali from September 2008 – June 2011	25	✓	✓
40	Susannah Herkert	Summary Chart of PMP records – residence locations of individuals that filled prescriptions	25	✓	✓
41	Susannah Herkert	Summary Chart of PMP records – pharmacy locations where prescriptions were filled	25	✓	✓
42	Susannah Herkert	Summary chart of patient files – residence locations of individuals in relation to Lancaster Clinic	26	✓	✓
43	Susannah Herkert	Summary chart of patient files – residence locations of individuals in relation to Garland Clinic	26	✓	✓
44		Reserved			
45	Susannah Herkert or Chris Neel	Patient file of ND	26	✓	✓
46	Susannah Herkert or Chris Neel	Patient file of KD	26	✓	✓
47	Susannah Herkert or Chris Neel	Patient file of CH			
48	Susannah Herkert or Chris Neel	Patient file of BM	26	✓	✓
49	Susannah Herkert or Chris Neel	Patient file of GP	26	✓	✓
50	Shirley Niamatali	Certified Plea Agreement			
51	Esmeralda Lozada	Certified Plea Agreement			

EXHIBIT NO.	SPONSOR	DESCRIPTION	O F F	O B J	E N T
52	Lisa Tumilson	Certified Plea Agreement	26		✓
53	Dr. Graves Owen	Medical Opinion			
54	Susannah Herkert or Nick Bristow or Chris Neel	Garland Clinic patient file of Nick Draper	27	✓	✓
55	Susannah Herkert or Nick Bristow or Chris Woolbright	Lancaster Clinic patient file of Nick Draper	27	✓	✓
56	Susannah Herkert or Tanisha Washington or Chris Woolbright	Lancaster Clinic patient file of Tanisha Washington	26	✓	✓

Respectfully submitted,

JOHN M. BALES
UNITED STATES ATTORNEY

/s/ G.R. Jackson
G. R. JACKSON
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify a true and correct copy of the foregoing was served by electronic filing by CM/ECF to the below listed attorneys on July 18, 2016.

/s/ G.R. Jackson
G. R. JACKSON
Assistant United States Attorney